

REMARKS/AGRUMENTS

Premature Final Rejection

Pursuant to 37 CFR 1.113, the rejection may be made final on a second or any subsequent examination or consideration by the examiner. Because the Office Action of September 15, 2003, is a first office action and the above referenced case is neither a continuing application nor a substitute for an earlier application, the final rejection is premature (MPEP 706.07(b), 706.07(c)). Accordingly, the applicants respectfully request that the Examiner withdraw the finality of the Office Action.

Claim Rejections – 35 U.S.C. 102

Claims 1-29 stand rejected under 35 U.S.C. 102(b) as allegedly being anticipated by Bach et al. (US patent no. 6,141,660). The Applicants respectfully traverse the above-noted rejections for the reasons set out below, and request reconsideration of these rejections.

To anticipate a claim, the reference must teach every element of the claim. "A claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference." *Verdegaal Bros. v. Union Oil Co. of California*, 814 F.2d 628, 631, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987).

Claim 1

Bach fails to disclose "a method, comprising:

defining a set of commands to be used with a command line interface (CLI), each
command in the set of commands specifying an action to be performed in a system;

defining a set of system interfaces including objects and methods, wherein each action specified in the command is associated with an object and a method, the object and the method performing semantics required by the command; and
creating a CLI description file for each command in the set of commands, the CLI description file mapping the command with the action and the associated objects and the methods” as required by claim 1.

Bach discloses that the class specifications are generated using a command line interface of a class definition tool. (Bach 4: 37-51, Fig. 9). The class definition tool (CDT) parses database files and generates class definitions for objects that encapsulate or wrapper data retrieved from the database. (Bach 5: 39-41). The CDT executes under the control of the operating system on the client computer, interacts with an operator via a Graphical User Interface (GUI) and/or a Command Line Interface (CLI). (Bach 10: 32-35). Thus, a CLI is available in Bach to accommodate user interaction with a Class Definition Tool. Because Bach’s CLI is provided specifically to allow a user to interact with the Class Definition Tool, a set of commands available to be used with the CLI is predefined. In particular, Bach discloses that the user can enter a command, including commands such as LOGIN, CREATE, UPLOAD, RUNSCRIPT, and QUIT (Bach, 17:4-29). For example, the RUNSCRIPT command runs one or more commands listed in a text file, where the file path is the required argument to RUNSCRIPT. There is nothing in Bach suggesting that there is a mechanism provided to *define* a set of commands to be used with the CLI. Rather, the commands are predefined and ready to be utilized by a user (see, e.g., syntax requirements described at Bach, 18: 1-67). This is distinct from “defining a set of commands to be used with a command line interface (CLI), each command in the set of commands specifying an action to be performed in a system” as required by claim 1.

In Bach, an object-oriented application program accesses a hierarchical database. (Bach 5: 35-37). The object-oriented application program interfaces with the objects framework (here,

a C++ class library). (Bach 7: 8-9): The object-oriented application program dynamically loads previously defined objects into the objects framework to access the database during execution time. (Bach 7: 9-12). Each of the objects encapsulates a logical unit of data retrieved from the database. (Bach 7: 33-34). The objects framework utilizes object classes and methods. (Bach 10: 38-40). The classes and methods in Bach are generated by CDT, which may be accomplished by using either GUI or CLI. (Bach 10: 38-40, Fig. 4). These generated classes and methods are to be used to allow the object-oriented application program accesses a hierarchical database, they are entirely unrelated to the semantics of the CLI commands. This is in stark contrast with “defining a set of system interfaces including objects and methods, wherein each action specified in the command is associated with an object and a method, *the object and the method performing semantics required by the command*” of claim 1.

The Office Action relies on Bach, 8: 1-23 and 12: 1-19 to show the operation of “creating a CLI description file for each command in the set of commands, the CLI description file mapping the command with the action and the associated objects and the methods” of claim 1. At columns 7 and 8, Bach discloses a business objects/data objects model, where the data objects provide a direct mapping of the data within each segment occurrence within a database segment type (Bach, 7: 65-67, 8: 1-4). This mapping, however, is entirely unrelated to CLI and CLI commands. At column 12, Bach discloses the Object Connector Class GUI utilized by the CDT. Bach discloses the buttons on the “Choose Project” page and the functions performed by each button (Bach, 12: 1-10). Not only there is no discussion of a description file, but also the passage cited by the Office Action deals with GUI rather than with CLI. This is in stark contrast with “creating a *CLI description file* for each command in the set of commands, the CLI description file mapping the command with the action and the associated objects and the methods” of claim 1.

Because not every element of claim 1 is present in Bach, claim 1 is patentable and should be allowed.

Claims 12 and 23 are patentable for at least the reasons articulated with respect to claim 1.

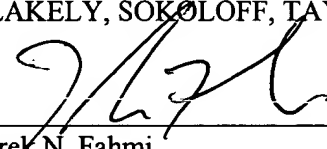
Claims 2-11, and 24-29 are patentable for at least the reason of being dependent on allowable claims.

If there are any additional charges, please charge them to our Deposit Account No. 02-2666.

Respectfully submitted,

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